

Superintendent Dave Ueberuaga  
Grand Canyon National Park  
P.O. Box 129  
Grand Canyon, AZ 86023



March 26, 2016

Dear Superintendent Ueberuaga:

On behalf of National Parks Conservation Association (NPCA) and the Grand Canyon Trust, thank you for the opportunity to comment on the *NPS Bison Herd Reduction Environmental Assessment Public Scoping Newsletter*. NPCA was formed in 1919 to advocate on behalf of and in support of our national parks and has more than one million members and supporters. Grand Canyon Trust was formed in 1985 and has dual priorities and responsibilities related to the greater Grand Canyon region—first, as a conservation organization committed to ecologically sustainable and conservation-driven public lands management across the region, and second as the livestock grazing permittee responsible for ensuring that livestock are sustainably managed across the Kaibab Plateau and adjoining portions of the North Rim Ranches.

Both of our organizations have a long history of working collaboratively with the park on this and many related issues. We were among a large group of stakeholders that participated in the multi-year “tri-agency effort” to develop a consensus approach to the bison issue. We believe this process developed sound and practical recommendations for resolving this long-standing challenge, and we urge the park to build its EA and management response around these consensus proposals.

We fully support the Environmental Assessment’s purpose “...to reduce the bison population density as quickly as possible to minimize potential effects on other natural and cultural resources.” Impacts from the hybrid bison continue to escalate. We commend Grand Canyon National Park for moving quickly to address the negative impacts of hybrid bison on park resources. We urge rapid deployment of multiple efforts to reduce herd size as soon as possible, with a goal of removing bison from the park entirely, over the long term. Pursuant to the NPS Organic Act, the National Park Service has a responsibility to protect the park from damage by the hybrid bison, and that responsibility can only be fulfilled if all of the animals are removed.

The 2016 Newsletter and EA indicate that the hybrid bison are destroying water sources, vegetation, soil and archaeological sites in the park. It also says that “...NPS resource specialists are concerned about impacts to sensitive park resources...and values, such as wilderness character” (pg. 2). One of the Grand Canyon’s purposes as stated in its Foundation Document is: “Protect and interpret Grand Canyon’s extraordinary scientific and natural values” (pg. 1). Part of the Grand Canyon’s significance is that it “...provides microhabitats for natural processes supporting rare and

endemic plant and wildlife species” (pg. 1). Given these commitments, it is necessary for the National Park Service to work to remove these invasive hybrid bison from park land for the continued protection of the park’s fragile natural and cultural resources.

Evidence of resource damage by hybrid bison is mounting. A peer-reviewed study of bison impacts showed that the herd “...reduced vegetative cover and biomass, increased prevalence of exposed soil, decreased vegetative height, and modestly altered plant species composition” near springs on the Kaibab Plateau (Reimondo et al. 2015). Subsequent research has verified that impacts are continuing. In a symposium at the 12th Biennial Conference of Research and Management on the Colorado Plateau, C. McMullen of Arizona Game and Fish Department stated that “Bison can have effects on archaeological sites and delicate seeps,” and that the herd “has spent much of its time on the Grand Canyon National Park, where ... their presence is undesired.” We agree, and note that, of all the invaluable resources within the park, water is perhaps the most precious, most limited, and most vital for the health of wildlife, rare plants, and other biodiversity. The well-documented impacts of bison on fragile seeps and springs are unacceptable. Archaeological sites are also vulnerable. Bison favor sheltered, south-facing aspects in winter, as did previous human inhabitants. The resulting degradation of irreplaceable cultural resources is unacceptable. The ongoing damage caused by hybrid bison is damaging the cultural and biological heritage of one of our nation’s great national parks.

Hybrid bison are exotic to Grand Canyon National Park. NPS Management Policies identify exotic or invasive species as “...those species that occupy or could occupy park lands directly or indirectly as the result of deliberate or accidental human activities” (4.4.1.3, pg. 43). The Arizona Game and Fish Department was able to maintain control of the herd at the House Rock Wildlife Area for more than three decades. However, changes in how the herd was managed have led to its relocation to Grand Canyon National Park and its population to more than quadruple. The exotic animals are causing unacceptable damage to park resources. Reducing the herd significantly and as quickly as possible will have no significant impact on park resources. In fact, removing the hybrid bison will positively affect park resources—and allowing them to remain in the park is already causing significant adverse impacts.

Evidence for bison in the region is scant. Perhaps most telling is that bison do not figure in the oral histories of nearby Native American communities or in the fossil record. The Kaibab Plateau’s ecological communities developed for centuries, perhaps millennia, without the influence of bison herds. This herd is descended from imported animals bred with cattle in the early 20<sup>th</sup> Century. Thus the herd in question most certainly is not native. Grand Canyon ecosystems are not adapted to the presence of bison, and allowing them to stay will result in continued resource degradation and immense expense to the park and the taxpayer. There is absolutely no basis for allowing the hybrid bison to remain within the park.

Therefore, NPCA and the Trust disagree with the current EA's reversal of the tri-agency agreement to remove all bison from the park. We object to its setting of a long-term management goal to maintain "a very low density" of this exotic species within the park. That decision must be reviewed in the Environmental Impact Statement for the long-term bison management plan, both of which have yet to be completed. We also disagree with the EA's conclusion "that the free-ranging bison occupying the park's North Rim lands and adjacent jurisdictions are native wildlife at the southwest edge of their historic range." The herd of bison hybrids that recently immigrated into Grand Canyon National Park cannot be assumed to be "native wildlife" or a "free-ranging bison population" without further review by scientists and the public. Furthermore, Arizona law defines bison as "stray" animals and *not* wildlife (Arizona Revised Statute 3-1401). The Kaibab National Forest Plan is in agreement, noting that bison are not appropriate on National Forest lands, except in the House Rock Valley Wildlife Area, where they are permitted under the terms of a special allotment negotiated with the Arizona Game and Fish Department decades ago.

On March 17, 2016, Public Employees for Environmental Responsibility (PEER) submitted an information quality complaint. It challenges a technical report that concluded that "bison are wildlife native to the Greater Grand Canyon region and should therefore be managed accordingly." We realize that historic reconstruction of ungulate ranges in North America is a difficult task that is fraught with uncertainty. But the conclusions of the Plumb report seem designed to advance a policy recommendation that is at odds with science, history, and common sense. It has not been peer-reviewed or published and has been challenged with good reason by PEER under the Data Quality Act of 2000. The National Park Service must respond to questions about the quality of information that led to its decision to declare hybrid bison "native" within 60 days. The rationale that underpins the long-term management goal for managing bison must be reviewed by the public before it can be adopted to guide management decisions.

The Trust and NPCA support PEER's request that NPS immediately "stop preparation of an EA or any other NEPA evaluation premised on this herd being native wildlife." As the PEER complaint states, NPS and cooperating agencies must "undertake a new externally peer-reviewed assessment on the nativity of the hybridized bison herd in Grand Canyon National Park." However, there remains the immediate need to reduce the herd size and to prevent further harm to park resources. If these animals were truly "native," the park would not really need to fence off fragile areas or monitor their activities. Like feral burros, they are introduced species that harm park resources, and they must be removed.

Therefore, we urge NPS to begin removal activities during the next three months while the herd is still gathered and before its normal dispersal with late summer thundershowers. We recommend combining non-lethal methods in accessible areas, and tightly controlled and humane culling in more remote and rugged areas, where capture and transport are impossible. These management techniques should be applied in tandem, so that fleeing bison are not able to retreat to safe refuge areas deep within the park. It may be that this situation could be considered an emergency, much

like the Green Sunfish at Glen Canyon National Recreation Area, though the magnitude of impacts and the management response to reverse current, destructive trends are far greater. If justifiable on the basis of a resource emergency, perhaps removal could begin immediately, before concluding the current EA or EIS on the long-term bison management plan.

We believe that proposals by the Arizona Game and Fish Commission and others for state-managed hunt of the hybrid bison be part of the solution could backfire, driving animals deeper into the park, with dire consequences for park resources in remote, steep and fragile side canyons. This herd has repeatedly demonstrated the ability to escape hunters and professional wildlife managers alike, and poorly coordinated management efforts, such as an open hunting season, are very likely to disperse the existing herd, while exerting only a weak pressure on population growth. Results to date on the effects of hunting indicate that hunters take too few animals to slow population growth, while consistently pushing animals into inaccessible safe areas. This will become even more problematic if hunters are allowed into the North Rim region of the park, except that the refugia will be the inner canyons, rather than the flatter areas of the park where they now reside, and where they are easily accessible to wildlife managers. For these reasons, we feel that public hunting is inappropriate for the Grand Canyon National Park. Hunting is not an appropriate activity in national parks, generally, and using volunteer hunters is not the answer to this resource management challenge. If lethal methods are required to eliminate hybrid bison from inaccessible parts of the park, where capture and removal are impossible or prohibitively expensive, the park should oversee and manage professional culling operations so that they happen in a humane fashion and in a way that best protects all the park's resources.

The park should not rely on fencing to protect park resources. Fencing does not work on bison, unless the posts are highly reinforced and maintenance is vigilant. After long discussion, the collaborative tri-agency group concluded that all practical options for fencing fail to provide true and lasting resource protection, while proven bison-proof fencing is prohibitively expensive. Furthermore, efforts to build protective fencing within the park are likely to cause unacceptable and unnecessary impacts to the park's native wildlife, while fragmenting their habitats. Frankly, we do not believe that the park's budget can support the building, monitoring, and maintenance of effective bison fencing – nor the efforts that would be required to mitigate its impacts on non-target animals – without taking funds from other, more important natural resource protection needs at the Grand Canyon.

Of the proposed management tools, NPCA and the Trust support the humane actions of capturing and removing the bison from the park immediately and, considering the damage these animals are doing, recommend the Park Service remove **all of the hybrid bison**. Recent trials, cooperatively managed by the park and state wildlife officials, were largely successful and demonstrated that animals could be captured and transported with relative ease. NPCA and the Trust could be supportive of properly managed culling of the herd when animals cannot be removed from remote

or sensitive locations, but additional planning and management plans must be in place. Open season on bison within the park would cause far more problems than it would solve.

Once removed, the hybrid bison should not be returned to any nearby land and wildlife managing agency that would release them and thus allow them to re-enter the park. NPS should identify appropriate recipients for live bison and proceed with capture and relocation at the earliest opportunity. The partnership with International Buffalo Council could provide one means to deal with the hybrid bison that are removed from the park.

Ongoing debate over the nativity of bison to the Grand Canyon Region has delayed action and obscured the needed focus on stewardship of park resources. NPCA and the Trust were disappointed with the change expressed in the re-scoping newsletter from considering these inappropriate, invasive, hybrid bison to simply bison that are “native wildlife at the southwest edge of their historic range.” There is little evidence for this claim.

We strongly believe that the hybrid bison must be removed from Grand Canyon National Park to allow the National Park Service to protect the park’s natural and cultural resources, and habitat for species that are actually native to the park. We encourage the Park Service to implement non-lethal means of bison removal from the park as soon as possible.

Thank you for considering our views.

Sincerely,



Kevin Dahl  
Arizona Senior Program Manager  
National Parks Conservation Association



Roger Clark  
Grand Canyon Program Director  
Grand Canyon Trust